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March 4, 2019

VIA ELECTRONIC DELIVERY

Connecticut General Assembly
Energy and Technology Committee
Legislative Office Building, Room 3900
Hartford, CT 06106
ettestimony@cga.ct.gov

RE: SUPPORT WITH AMENDMENTS - Raised H.B. No. 7251:

An Act Concerning Long-Term Contracts For Certain Class I Generation Projects And The Residential Solar Investment Program And Requiring A Study Of The Value Of Solar

Dear Members of the Energy and Technology Committee:

As background, Trinity Solar is a residential solar installer with operations throughout Mid-Atlantic and Northeast states. We employ about 1500 people, 300 of which are Connecticut residents. We have been operating in Connecticut since 2008 and, today, we install on average 250 solar electric systems per month on Connecticut homes. To put that in perspective, we install more in 1 month now than we installed in total from 2008 to 2013. It took considerable time to build our Connecticut business and we fear the unintended consequences of last year's Senate Bill No. 9 – Section 7 in particular - could, without careful consideration, undermine all of our efforts.

As currently drafted, we support Raised Bill No. 7251, but only with amendments. While the 2-year extension of the Connecticut Green Bank's Residential Solar Investment Program (RSIP) is appropriate, the net metering rules required on last year's Senate Bill No. 9, Sec. 7, are not able to be implemented as written and we need a bridge bill to avoid a catastrophic collapse of Connecticut's solar industry.

Specifically, an extension of RSIP by 100 MW and a thorough analysis of solar's cost and benefits prior to setting any tariff rates is needed. The extension of RSIP will provide market stability during the value of solar study period. The study and associated data collected is critical to the proper setting of tariff rates. Otherwise, when one sets the tariff rates without this information,

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the rates are likely to either be set too high or too low. If set too low, nothing will be installed and the industry will collapse. If set too high, unnecessary funding will be deployed resulting in overpaying for the solar assets. It is important to also note that it normally takes up to two years to conduct a value of solar study¹ in 2016 and issued the final report in November 2018. Hence, a proper study will take at least 18 months (the period of time when the home solar industry is working through the additional 100MW as proposed in HB 7251). We recommend amending the bill to reflect this reality.

Declining incentives and rising costs are a big issue for our industry. In fact, the residential solar incentive in Connecticut has been cut twelve times since the program started. Federal tax credits begin declining in 2020. President Trump's solar tariffs have pushed costs higher. Without sound data, now is not the time to rush such a major decision. Careful consideration is needed and the process for evaluating solar's benefits and costs takes time. Nevada removed net metering and their market instantly collapsed. Maine replaced net metering with a tariff and their solar industry vanished. DEEP needs time to implement a thoughtful and well-conceived residential tariff program. This bill, with amendments, gives them that time while stabilizing the residential solar industry.

On behalf of the 300 Connecticut residents employed in the state's residential solar market by Trinity Solar, we urge you to make the changes needed to Raised Bill No. 7251 and to pass it out of committee.

Respectfully Submitted,

A handwritten signature in black ink that reads "Ed Merrick". The signature is written in a cursive, flowing style.

Ed Merrick

¹ <http://www.solarwakeup.com/wp-content/uploads/2018/11/MDVoSReportFinal11-2-2018.pdf>